

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO

APPLICATION AND AFFIDAVIT OF THE)	
UNITED STATES OF AMERICA FOR A)	Magistrate Vascura
SEARCH WARRANT OF THE UNITED)	Case No. 2:23-mj-693
STATES POSTAL SERVICE PRIORITY)	UNDER SEAL
MAIL PARCEL BEARING TRACKING)	
NUMBER 9505 5128 5733 3333 1264 08)	

I, Justin D. Koble, Postal Inspector with The United States Postal Inspection Service,
being duly sworn, depose and say:

INTRODUCTION

1. I make this affidavit in support of an application under Rule 41 of the Federal Rules of Criminal Procedure for a warrant to search the United States Postal Service Priority Mail parcel bearing tracking number 9505 5128 5733 3333 1264 08 (SUBJECT PARCEL), further described in Attachment A, for the things described in Attachment B. The SUBJECT PARCEL is currently located in the Southern District of Ohio, Eastern Division.

2. I am a United States Postal Inspector with the United States Postal Inspection Service (USPIS) and have been so employed since July 2014. I am currently assigned to the Narcotics and Money Laundering Team at the USPIS's Columbus, Ohio field office. In this capacity, I am responsible for investigating the illegal use of the United States Mails for the purpose of transporting controlled substances, such as methamphetamine, heroin, fentanyl, fentanyl-related analogs, cocaine, and other controlled substances, in violation of, among other statutes, Title 21, United States Code, Sectuib 841(a)(1) (manufacturing, distribution, or possession with the intent to manufacture or distribute a controlled substance), 843(b) (unlawful use of a communication facility in the commission of a crime), and 846 (drug conspiracy). In

addition, I am responsible for investigating possible violations of Title 18, United States Code, Sections 1956 and 1957 (money laundering).

3. I have been involved in the investigation and discovery of drug contraband and drug proceeds on numerous occasions. I have personally been the affiant for search warrants that have resulted in the discovery of controlled substances and drug proceeds. My current assignment to the Columbus Processing and Distribution Center (P&DC) involves investigating the use of the United States Mails by drug traffickers, in which established drug package profiles, surveillance, and drug detection dogs, among other investigative tools, are utilized.

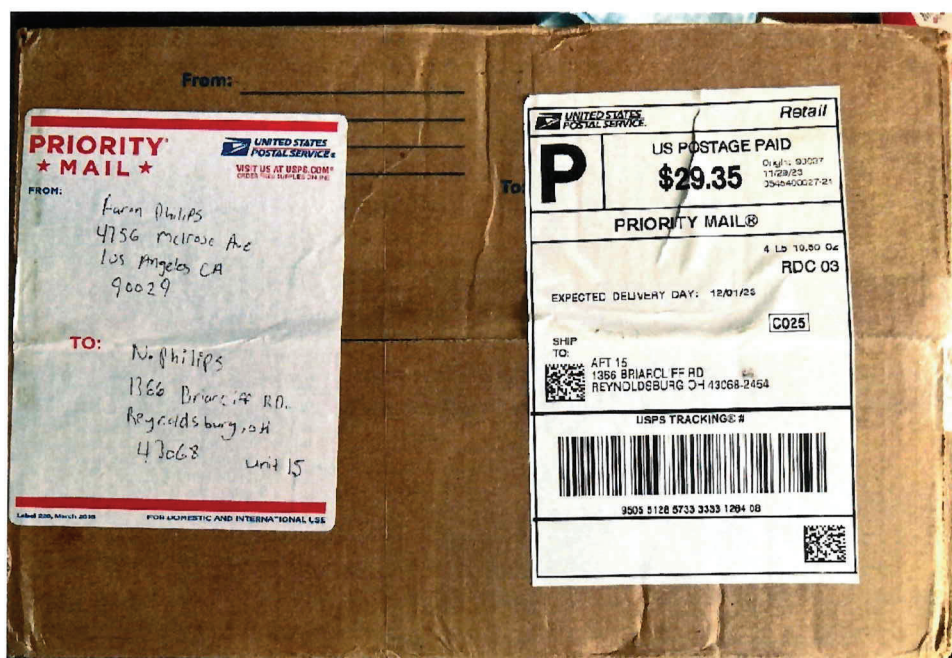
4. Experience and drug trafficking intelligence have demonstrated that Priority Mail and Priority Mail Express are commonly used to transport drugs and drug proceeds because of their reliability and the time pressures they place on law enforcement agents to execute a successful controlled delivery.

5. The facts set forth in this affidavit are based on my personal knowledge, knowledge obtained during my participation in this investigation, knowledge obtained from other individuals, review of records related to this investigation, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience. Because this affidavit is submitted for the limited purpose of establishing probable cause in support of the application for a search warrant, this affidavit does not set forth each and every fact learned by me during the course of this investigation.

SUBJECT PARCEL

6. On or about December 4, 2023, USPIS interdiction personnel in Columbus, Ohio, interdicted the SUBJECT PARCEL upon arrival at the USPS Reynoldsburg Post Office, 7185 East Main Street, Reynoldsburg, Ohio 43068. The SUBJECT PARCEL is addressed to "N. Philips, 1366 Briarecliff Rd, Unit 15, Reynoldsburg, OH 43068," with a return address of "Aaron

Philips, 4756 Melrose Ave, Los Angeles, CA 90029.” The SUBJECT PARCEL is a brown “pen+GEAR” cardboard box measuring approximately 12” x 8” x 10” and weighing approximately 4 pounds, 10.5 ounces. The SUBJECT PARCEL was mailed from the USPS Los Feliz Station Post Office, 1825 North Vermont Avenue, Los Angeles, California 90027, on or about November 29, 2023. USPS business records indicate the \$29.35 in postage affixed to the SUBJECT PARCEL was paid for in cash. A picture of the SUBJECT PARCEL is depicted below:



PROBABLE CAUSE

7. Your Affiant has become aware through experience and training that drug traffickers frequently use Priority Mail Express and/or Priority Mail services offered by the

USPS, to transport narcotics and other dangerous controlled substances as well as drug proceeds. These services charge a higher fee because they are very timely, reliable, and are trackable. However, due to the higher fee, these services are not typically used for personal mailings but, rather, are utilized by commercial mailers and business customers. As they are mostly used for commercial services, they are typically paid for using electronic postage or credit card as opposed to being paid for in cash. Because these services are reliable and trackable, they are often favored by persons who transport contraband and/or illegal controlled substances and drug proceeds. When used for illegal activity, these services are frequently paid for in cash. In my training and experience, drug traffickers pay for these services in cash so that the transaction cannot be traced to a particular credit card or business account, and because drug trafficking is often a cash business.

8. Among the characteristics of the drug profile possessed by the SUBJECT PARCEL is the “source state” origination of the parcel, as well as the destination of the SUBJECT PARCEL.

9. Your affiant submits that the origin state of the SUBJECT PARCEL bears on the issue of probable cause. For example, US Postal Inspectors, Special Agents of the Drug Enforcement Administration (“DEA”), and other intelligence sources have identified California as a source state for illegal drugs flowing into Central Ohio and a destination state for the proceeds from the sale of these illegal drugs. Based on my training and experience, I know drug traffickers frequently utilize various shipping and mail entities, including the United States Postal Service, for the shipment of controlled substances. Frequently, the same shipping entity utilized for the shipment of controlled substances is also utilized for the shipment of the proceeds derived from the sale of these controlled substances.

10. On or about December 4, 2023, checks of USPS, law enforcement, and open-source electronic databases were conducted to determine the validity of the destination information contained on the SUBJECT PARCEL. The destination address, "1366 Briarcliff Rd, Unit 15" was found to be a valid and deliverable address in the 43068 zip code. An individual named "Nate Phillips" was found to be associated with this address.

11. Further, on or about December 4, 2023, checks of USPS, law enforcement, and open-source electronic databases were conducted to determine the validity of the return information contained on the SUBJECT PARCEL. The return address, "4756 Melrose Ave" was found to be a valid and deliverable address in the 90029 zip code. The name "Aaron Philips" was *not* found to be associated with this address.

12. Regarding both the above-described return and destination addresses, I know through training and experience that shippers of drugs and drug proceeds will often utilize a fictitious return name with a valid return address to legitimize the shipment and to reduce the possibility of identification and apprehension by law enforcement.

13. Because the SUBJECT PARCEL originated in California, a state known as a source of controlled substances being mailed to Central Ohio, postage for the SUBJECT PARCEL was paid for using cash, and the return and name did not associate with the address, investigators submitted the SUBJECT PARCEL for examination by a drug-detecting canine.

EXAMINATION BY DRUG DETECTING CANINE

14. On or about December 8, 2023, US Postal Inspectors contacted Trooper Jeff McNamera, Ohio State Highway Patrol, who is the handler for "Dale," a drug-detecting canine. K-9 "Dale" has been certified by the Ohio Peace Officers Training Association ("OPOTA") since December 2022 for tracking, article search, and the detection of marijuana, cocaine, heroin,

methamphetamine, and their derivatives. K-9 “Dale” has had over 200 hours of training at the Ohio Highway Patrol K-9 Training Facility. Both in training and actual deployments, K-9 “Dale” has successfully detected narcotics by demonstrating clear, passive alerts, and has established himself as a highly reliable police service dog.

15. The SUBJECT PARCEL was hidden among other parcels and USPS mail processing equipment and K-9 “Dale” was allowed to search the entire area. Trooper McNamera concluded that K-9 “Dale” did alert positively to the SUBJECT PARCEL. Based on that alert, Trooper McNamera concluded that the odor of one or more of the drugs K-9 “Dale” is trained and certified to detect was present.

16. Based upon training and experience, I respectfully submit that the above information is indicative of drug trafficking activity, and that, based on the above, there is probable cause to search the SUBJECT PARCEL.

17. If the SUBJECT PARCEL is found to contain controlled substances, these controlled substances will be seized as part of an ongoing drug trafficking investigation.

CONCLUSION

18. Based upon the foregoing facts and my training, experience, and expertise as a US Postal Inspector, I submit there is probable cause to search the SUBJECT PARCEL for controlled substances, drug proceeds, and other evidence of violations of Title 21, United States Code, Sections 841(a)(1), 843(b), and 846.

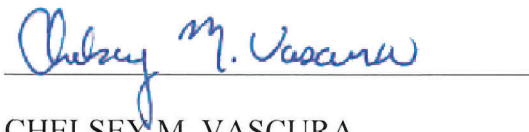
19. WHEREFORE, I respectfully request that the Court issue a warrant, authorizing agents of the USPIS, including but not limited to other law enforcement agents and technicians assisting in the above-described investigation, to open, view, photograph, and seize, if necessary, the SUBJECT PARCEL and its contents.

20. The above information is true and correct to the best of my knowledge,
information, and belief.

A handwritten signature in blue ink, appearing to read "JD Koble", written over a horizontal line.

Justin D. Koble
US Postal Inspector

Sworn and subscribed to me this 12th day of December 2023

A handwritten signature in blue ink, appearing to read "Chelsea M. Vascara", written over a horizontal line.

CHELSEY M. VASCURA
United States Magistrate Judge